IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

CATHY CARTER,	§
	§
Plaintiff,	§ CIVIL ACTION NO.
	§ 1:20-cv-01674-TWT-JSA
V.	§
	§
PAUL HOWARD, in his individual	§
and official capacity,	§
	§
Defendant.	§
	§
	§

CONSENT MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE PLEADINGS

Defendant Paul Howard herewith files a *Consent Motion for Extension of Time to File Dispositive Pleadings*. Mr. Howard moves to request a one-week extension of the deadline to file dispositive pleadings through September 13, 2022, based on the following:

- 1. Dispositive pleadings are currently due on September 6, 2022.
- 2. The parties will use a one-week extension to discuss a settlement.
- 3. The first date that the adjuster and the parties are all available to discuss settlement in a formal or informal mediation is Monday, September 12.

- 4. If the settlement talks are unsuccessful on Monday, September 12, Defendant will file dispositive motions the following day, Tuesday, September 13, 2022.
- 5. Plaintiff consents to this Motion and Defendant respectfully requests an extension to file any dispositive pleadings through September 13, 2022.

This 6th day of September, 2022.

HENEFELD & GREEN, P.C.

/s/ Noah Green
Noah Green
Georgia Bar No. 468138
Attorney for Defendant

3017 Bolling Way NE, Suite 129 Atlanta, Georgia 30305 (404) 841-1275 ngreen@henefeldgreen.com

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), this is to certify that the foregoing has been prepared using Book Antiqua 13-point font in compliance with Local Rule 5.1.

/s/Noah Green Noah Green Georgia Bar No. 468138

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	§	
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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing *Consent Motion for Extension of Time to File Dispositive Pleadings* with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

This 6th day of September, 2022.

HENEFELD & GREEN, P.C.

/s/ Noah Green

Noah Green

Georgia Bar No. 468138 Attorney for Defendant

3017 Bolling Way NE, Suite 129 Atlanta, Georgia 30305 (404) 841-1275 ngreen@henefeldgreen.com